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8 Attorneys for Creditor
CHURCH OF SCIENTOLOGY
9 INTERNATIONAL

10
11 UNITED STATES BANKRUPTCY COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 In re

14 GERALD ARMSTRONG,

15 Debtor

16
17 CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California not-
18 for-profit religious corporation,

19 Creditor,

20 vs.

21
22 GERALD ARMSTRONG,

23 Debtor.
24
25
26
27
28

) CASE NO. 95-10911 aj

) CHAPTER 7

) Adversary Proceeding No.
95-1164

) DECLARATION OF LAURIE J.
BARTILSON IN SUPPORT OF
CHURCH OF SCIENTOLOGY
INTERNATIONAL'S MOTION FOR
PROTECTIVE ORDER AND
REQUEST FOR SANCTIONS

) [F.R.C.P. 26, 37]

) DATE: October 13, 1995

) TIME: 11:00 a.m.

) CTRM: Hon. Alan Jaroslavsky

1 LAURIE J. BARTILSON deposes and says:

2 1. My name is Laurie J. Bartilson and I am one of the
3 attorneys responsible for the representation of creditor, Church
4 of Scientology International in this action. I have personal
5 knowledge of the facts set forth in this Declaration and could
6 competently testify thereto if called as a witness.

7 2. Attached hereto and incorporated herein are true and
8 correct copies of documents submitted as exhibits in support of
9 the Church of Scientology International's memorandum of points
10 and authorities in support of CSI's motion for protective order:

11 Exhibit A: Gerald Armstrong's First Inspection Demand To
12 Plaintiff;

13 Exhibit B: Letter from Laurie Bartilson to Gerald
14 Armstrong dated September 15, 1995.

15 3. Gerald Armstrong called me on September 18, 1995, in
16 response to my letter, Exhibit B. I explained to him again the
17 requirements of Rule 26, and suggested that he review it himself.
18 He stated that he did not want to withdraw the document demand,
19 but would read the rule and call again on September 18. He also
20 stated that he was not willing to have a Rule 26 meeting after
21 the presently-scheduled hearing on CSI's motion to strike the
22 answer. He asked me to continue that motion to strike or
23 withdraw it. I refused. Armstrong did not contact my office
24 again, nor did he contact my co-counsel, Mr. Wilson.

25 4. I have expended in excess of 2 hours preparing this
26 motion for protective order. In addition, I expect to spend
27 additional time traveling to Santa Rosa, preparing for and
28

1 arguing this motion. My normal billing rate is \$200 per hour,
2 making the cost of this motion to my client, in attorneys' fees
3 alone, \$500. My travel expenses will be \$340. I therefore
4 request sanctions in the amount of \$840.

5 I declare under the penalty of perjury under the laws
6 of the United States of America and the State of California that
7 the foregoing is true and correct.

8 Executed this 19th day of September, 1995, at Larkspur,
9 California.

10 
11 _____
12 Laurie J. Bartilson
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EXHIBIT A

1 Gerald Armstrong
2 715 Sir Francis Drake Boulevard
3 San Anselmo, CA 94960
4 (415)456-8450
5 In Propria Persona

6 UNITED STATES BANKRUPTCY COURT
7 NORTHERN DISTRICT OF CALIFORNIA

8	In re)	Case No. 95-10911 aj
9)	
10	GERALD ARMSTRONG,)	Chapter 7
11	Debtor)	Adv. No. 95-1164
12)	GERALD ARMSTRONG'S
13	CHURCH OF SCIENTOLOGY)	FIRST INSPECTION DEMAND
14	INTERNATIONAL, a California non-)	TO PLAINTIFF
15	profit religious corporation,)	
16	Plaintiff,)	
17	v.)	
18	GERALD ARMSTRONG,)	
19	Defendant.)	

20 TO PLAINTIFF CHURCH OF SCIENTOLOGY INTERNATIONAL AND ITS ATTORNEYS
21 OF RECORD:

22 PROPOUNDING PARTY: Defendant GERALD ARMSTRONG

23 RESPONDING PARTY: Plaintiff CHURCH OF SCIENTOLOGY
24 INTERNATIONAL;

25 SET NO: ONE

26 DEMAND IS HEREBY MADE pursuant to the United States Federal
27 Rules of Civil Procedure, the United States Bankruptcy Code, and
28 all applicable Laws of the United States and California, that you
produce and permit inspection and copying of the documents

1 described below. The place of inspection shall be 715 Sir Francis
2 Drake Boulevard, San Anselmo, California. The time for such
3 inspection shall be 4:00 p.m. on September 15, 1995, and
4 continuing so long as reasonably required. Production by mail of
5 copies of the documents demanded herein may occur in lieu of
6 personally appearing at the location of the demanded inspection.

7 DEFINITIONS AND INSTRUCTIONS

8 As used herein:

9 1. The term "Documents" means: (a) all writings of any kind
10 whether handwritten, typed, printed or otherwise produced or
11 reproduced, and including but not limited to all agreements
12 contracts, letters, telegrams, teletypes, telexes, cables, inter-
13 office and intraoffice communications, memoranda, notes, opinions,
14 orders, reports, evaluations, recommendations, reviews, analyses,
15 minutes, entries in personal diaries or other record books,
16 summaries or notes of conversations or communications of any type
17 or description (including, without limitation, telephone
18 conversations, personal conversations or interviews, meetings,
19 conferences, negotiations and investigations), marginal comments
20 appearing in any documents, calendars, pamphlets, books, manuals,
21 directives, bulletins, news releases, advertisements, ledgers,
22 statistics, surveys, checks, financial statements, invoices,
23 receipts, work sheets opinions, evaluations, recommendations and
24 analyses and all drafts of any of the foregoing writings; (b) all
25 graphic, mechanical, audio, video, magnetic or electronic
26 reproductions, representations, recordings or compilations of data
27 of any kind, including but not limited to, drawings, charts,
28 graphs, motion picture film, microfilms, microfiles, reels,
cassettes, plates, photographs, slides, tapes or other recordings,

1 videotapes, punch cards, magnetic tapes, discs, data cells and
2 drums, and drafts.

3 For purposes of the foregoing definitions, the term "drafts"
4 means earlier, preliminary, preparatory or tentative versions of
5 all or part of a document, whether or not such draft was
6 superseded by a later draft and whether or not the terms of the
7 draft are the same as or different from the terms of the final
8 document; and the term "copies" of any documents means all
9 versions of a document which are not, in every respect, identical
10 to the documents being produced.

11 2. All documents are to be produced in the file in which
12 such documents have been maintained in the order within each file
13 in which such documents have been maintained.

14 3. The term "communications: includes any oral, written or
15 visual contact between two or more persons in which any
16 information or opinion was exchanged, imparted or received.

17 4. In the event that any document called for by this
18 Request has been destroyed or discarded or otherwise disposed of,
19 that document is to be identified as completely as possible,
20 including, without limitation, the following information: date of
21 disposal, manner of disposal, reason for disposal, person
22 authorizing the disposal and person disposing of the document.

23 5. This Request is intended to include all documents,
24 as defined above, in the possession, custody or control of
25 plaintiff Scientology organization, (hereinafter "you" or "your")
26 its employees, agents, officers, or attorneys, located anywhere
27 and prepared by anyone. "You" or "your" herein includes all
28 branches, offices, groups, agencies, networks comprising
plaintiff, including, but not limited to, Religious Technology

1 Center (RTC"), Church of Spiritual Technology ("CST"), Scientology
2 Missions International ("SMI"), Church of Scientology of
3 California ("CSC"), Church of Scientology International ("CSI"),
4 Author Services, Incorporated ("ASI"), Church of Scientology of
5 Greater Los Angeles ("CSLA"), Church of Scientology of San
6 Francisco ("CSSF"), Church of Scientology Flag Service
7 Organization ("FSO"), International Association of Scientologists
8 ("IAS"), Guardian's Office ("GO"), Office of Special Affairs
9 ("OSA"), OSA International, and all OSA offices or units
10 internationally, Commodore's Messenger Organization ("CMO"),
11 Watchdog Committee ("WDC"), Inspector General Network ("IGN"),
12 World Institute of Scientology Enterprises ("WISE").

13 The following is the designation of the documents to be
14 produced for inspection as above stated:

15 1. All documents which in any way discuss, mention,
16 concern, or relate to Gerald Armstrong, or Gerry Armstrong, or any
17 code name or designation identifying Gerald Armstrong used by you.

18 2. The articles of incorporation, and all amendments
19 thereto, of your corporate entities listed in definitions no. 5,
20 above.

21 3. The By-Laws, and all amendments thereto, of your
22 corporate entities listed in definitions no. 5, above.

23 4. All minutes of all meetings of the Board of Directors of
24 your corporate entities, including but not limited to those
25 entities listed in definitions no. 5, above, which mention,
26 concern or relate in any way to Gerald Armstrong, or Gerry
27 Armstrong, or any code name or designation identifying Gerald
28 Armstrong used by you.

5. All minutes of all meetings of the Board of Directors of

1 your corporate entities, including but not limited to those
2 entities listed in definitions no. 5, above, which mention,
3 concern or relate in any way to Judge Paul G. Breckenridge, Jr.,
4 Michael J. Flynn, Bruce Bunch, Michael Tabb, Julia Dragojevic,
5 Ford Greene, Paul Morantz, John Elstead, Toby Plevin, Joseph A.
6 Yanny, Michael L. Walton and Charles B. O'Reilly.

7 6. All minutes of all meetings of the Board of Directors of
8 your corporate entities, including but not limited to those
9 entities listed in definitions no. 5, above, which mention,
10 concern or relate in any way to "enemies," "suppressive persons,"
11 ("SP's") or "squirrels," as such terms are commonly understood in
12 your writings and jargon.

13 7. All documents of any kind obtained by you from the Los
14 Angeles Superior Court after December 6, 1986 in the case of and
15 as a result of the December, 1986 settlement of, Church of
16 Scientology of California v. Gerald Armstrong, No. C 420153
17 (hereinafter, "Armstrong I.")

18 8. All documents of any kind received by you from Gerald
19 Armstrong after December 6, 1986 pursuant to the December, 1986
20 settlement of Armstrong I.

21 9. All documents of any kind received by you from Gerald
22 Armstrong's attorneys, including but not limited to Michael J.
23 Flynn, Michael Tabb, Julia Dragojevic and Bruce Bunch, after
24 December 6, 1986, pursuant to the December, 1986 settlement of
25 Armstrong I.

26 10. All settlement agreements or other contracts entered
27 into by you with each of the following attorneys, litigants,
28 claimants or defendants: Michael J. Flynn, Julia Dragojevic, Bruce
Bunch, Michael Tabb, Walt Logan, Garry P. McMurry, William Franks,

1 Laurel Sullivan, Howard Schomer, Gabriel Cazares, Nancy McLean,
2 John McLean, Tonja Burden, Margery Wakefield, Edward Walters,
3 Martin Samuels, Nancy Dincalci, Kima Douglas, Michael Douglas,
4 Robert Dardano, Warren Friske, Tonja Burden, Julie Christofferson,
5 Bent Corydon, Toby Plevin, James Bostrom, Enid Vien, Vicki
6 Aznaran, Richard Aznaran, Sarge Gerbode.

7 11. All declarations, affidavits or other documents signed
8 by any or all of the individuals named in the preceding request as
9 a condition or part of, or in connection with, any settlement
10 entered into between said individuals and you.

11 12. All documents of any kind provided at any time by you in
12 any way or manner whatsoever to any member of the media or any
13 media company or organization which mention, concern or relate in
14 any way to Gerald Armstrong.

15 13. All documents reflecting, evidencing or relating to any
16 and all financial expenditures of any kind or nature, including,
17 but not limited to, wages, fees, charges, costs, payments,
18 deposits, advances, transfers or donations, for, or relating in
19 any way to, actions or things of any kind or nature, including,
20 but not limited to work, services, products, operations,
21 communications, evaluations, executions, missions, projects,
22 transportation, publications, writings, transmissions,
23 disseminations, which mention, concern or relate in any way to
24 Gerald Armstrong, made at any time from 1981 through the present
25 to anyone or any entity, including, but not limited to attorneys,
26 law firms, brokers, contractors, developers, private
27 investigators, private investigator firms, agents, agencies,
28 operatives, case officers, cutouts, your employees, your
directors, and businesses or other entities including printers,

1 mail services, suppliers, communications companies, and airline
2 companies.

3 14. All documents providing, recording, reflecting,
4 evidencing or relating to the name, address and telephone number
5 of each individual member of the media or any media company,
6 organization or entity to whom you at any time provided any and
7 all documents of any kind which mention, concern or relate in any
8 way to Gerald Armstrong.

9 15. All documents providing, recording, reflecting,
10 evidencing or relating to the time, place, identity of your agent
11 provider or transmitter, and means of transmission or provision by
12 you to any member of the media or any media company or
13 organization or entity of each and every document of any kind
14 which mentions, concerns or relates in any way to Gerald
15 Armstrong.

16 16. All documents of any kind provided by you at any time
17 in any way or manner whatsoever to any member of the media or to
18 any media company or organization which mention, concern or relate
19 in any way to Michael J. Flynn.

20 17. All lawsuits, bar complaints or requests for criminal
21 charges filed or made at any time by you against or concerning
22 Michael J. Flynn, his law firm, or any other attorney associated
23 or connected with him or his law firm.

24 18. All documents of any kind provided by you at any time in
25 any way or manner whatsoever to any member of the media or to any
26 media company or organization which mention, concern or relate in
27 any way to Ford Greene.

28 19. All bar complaints or requests for criminal charges
filed or made by you at any time against or concerning Ford

1 Greene.

2 20. All documents of any kind provided by you at any time
3 in any way or manner whatsoever to any member of the media or any
4 media company or organization which mention, concern or relate in
5 any way to Judge Paul G. Breckenridge, Jr., or his decision of
6 June 20, 1984 in Armstrong I.

7 21. All documents of any kind, including but not limited to
8 evaluations (evals), orders, project orders, mission orders,
9 program orders, targets, private investigator (PI) orders,
10 intelligence orders, OSA orders, Guardian Office orders,
11 correspondence, reports, compliance reports, daily reports,
12 briefing reports, debriefing reports, statistic reports, battle
13 plans, PI reports, photographs, audio or video recordings, by
14 whatever means and by whatever designation or label, computer
15 records including E-mail, E-files, orders, messages, directories,
16 data, disks, tapes and other computer storage or retrieval
17 designations whatsoever, and any and all stolen documents which
18 concern, refer or relate to, or form part of any intelligence or
19 other operations or actions directed at or relating in any way to
20 Gerald Armstrong; including but not limited to the "Gerald
21 Armstrong Project" involving at least your operative Dan Sherman;
22 the "Gerald Armstrong Operation" involving at least your
23 operatives Sherman, David Kluge, Mike Rinder and your private
24 investigator Eugene M. Ingram; the Gerald Armstrong "London
25 operation" involving at least David Kluge and your private
26 investigators which culminated in a confrontation in Heathrow
27 Airport and sworn affidavits accusing Armstrong of passing stolen
28 documents to Arab agents; the Gerald Armstrong "pc folder
operation" in which your operative David Kluge attempted to get

1 Armstrong to accept "stolen" preclear folders; the Gerald
2 Armstrong "Nevada operation" in which your operative Kluge
3 attempted to get Armstrong to travel to Nevada for a "meeting;"
4 the Gerald Armstrong "Renee operation" in which your operatives
5 Sherman and Kluge set up a meeting between Armstrong and your
6 operative "Renee;" the "Boston FBI operation" in which your agents
7 attempted to have the false criminal charge of impersonating an
8 FBI officer brought against Armstrong; the "LA DA operation" in
9 which your agents attempted to frame Armstrong with a crime and
10 then pressured the District Attorney into filing charges against
11 him; the "Van Schaick operation" in which you used Michael Flynn's
12 client Lavenda Van Schaick to execute a false declaration about
13 Armstrong for the purpose of bringing a contempt of court charge
14 against him; the "crooked lawyer operation" where your operative
15 Kluge took Armstrong to a Glendale lawyer to discuss a phony plan
16 of bringing a phony lawsuit against your corrupt leadership by a
17 phony group of phony reformers.

18 22. The briefcase and all papers, documents and materials
19 contained therein, including but not limited to the original
20 artwork for a book, the working title for which was "The Hubbard
21 Letters," which were stolen from Armstrong's car trunk in 1984 by
22 your agents.

23 23. All other drawings, art, writing, manuscripts,
24 documents, papers or materials of any kind stolen or tricked from
25 Armstrong at any time by any of your agents or operatives.

26 24. All correspondence or documents of any kind received or
27 taken from Gerald Armstrong by your operative Dan Sherman.

28 25. All correspondence or documents of any kind received or
taken from Gerald Armstrong by your operative David Kluge.

1 26. All correspondence or documents of any kind received or
2 taken from Gerald Armstrong by your operative Renee.

3 27. All GO "Intelligence" or "Information," "intel" or
4 "info, (aka "B-1") files or documents which in any way or manner
5 mention, concern or relate to Gerald Armstrong.

6 28. All OSA files or documents which in any way or manner
7 mention, concern or relate to Gerald Armstrong, including
8 computer records of any kind, E-mail, E-files, orders, messages,
9 directories, data, disks, tapes and other computer storage or
10 retrieval designations whatsoever.

11 29. Any and all of Gerald Armstrong's "ethics files" and all
12 documents contained therein.

13 30. Any and all of Gerald Armstrong's "personnel files" and
14 all documents contained therein'

15 31. Gerald Armstrong's SO#1 (Standing Order No. 1) file and
16 all documents contained therein.

17 32. Any and all Mission files containing all Project Orders
18 or Mission Orders (MO's), reports, and any other documents
19 relating to any missions carried out by Gerald Armstrong as a Sea
20 Organization missionary between the years 1971 and 1981.

21 33. All organization publications, including but not limited
22 to Hubbard Communication Office Bulletins ("HCOB's"), Hubbard
23 Communication Office Policy Letters ("HCOPL's," or "PL's"),
24 Executive Directives ("ED's"), Conditions Orders, Orders, Project
25 Orders, Mission Orders, Program Orders, GO Orders and Directives,
26 OSA Orders and Directives, CMO Orders and Directives, RTC Orders
27 and Directives, CST Orders and Directives, "Freedom," "Membership
28 News" and all other magazines, periodicals, handouts, "DA
documents," or "DA packs," which in any way or manner whatsoever

1 contain any mention of, or concern or relate to, Gerald Armstrong.

2 34. All documents of any kind given by you at any time to
3 any member of the Government of the United States or any other
4 country, or any US or foreign government agency or organ, or state
5 agency or organ, or law enforcement personnel, departments or
6 offices, including but not limited to the Federal Bureau of
7 Investigation, Internal Revenue Service, Los Angeles Police
8 Department, and Los Angeles District Attorney, which mention,
9 concern or relate in any way to Gerald Armstrong.

10 35. All documents providing, recording, reflecting,
11 evidencing or relating to the time, place, identity of your agent
12 provider or transmitter, and means of transmission or provision by
13 you to any member of the Government of the United States or any
14 other country, or any US or foreign government agency or organ, or
15 state agency or organ, or law enforcement personnel, departments
16 or offices, including but not limited to the Federal Bureau of
17 Investigation, Internal Revenue Service, Los Angeles Police
18 Department, and Los Angeles District Attorney, of each and every
19 document of any kind which mentions, concerns or relates in any
20 way to Gerald Armstrong.

21 36. All documents of any kind received by you at any time
22 from any member of the Government of the United States or any
23 other country, or any US or foreign government agency or organ, or
24 state agency or organ, or law enforcement personnel, departments
25 or offices, including but not limited to the Federal Bureau of
26 Investigation, Internal Revenue Service, Los Angeles Police
27 Department, and Los Angeles District Attorney, which mention,
28 concern or relate in any way to Gerald Armstrong.

37. Each and every document provided or submitted by you at

1 any time to the Internal Revenue Service in support of or
2 concerning any and all applications for or in pursuit of your tax
3 exempt status, including, but not limited to documents provided in
4 or as part of any judicial or administrative proceeding concerning
5 or relating to your application or applications for or in pursuit
6 of your tax exempt status.

7 38. Any and all documents of any kind which mention, concern
8 or relate in any way to Mission Corporate Category Sort-out,
9 including, but not limited to the audio recordings, and all
10 written transcripts thereof, which are commonly known as the "MCCS
11 Tapes," and which have been the subject of litigation known as US
12 v. Zolin.

13 39. All orders of any kind from 1981 to the present from any
14 and all of your agents, operatives, employees, officers,
15 directors, ministers, members, units, offices, known or unknown,
16 stated or not, to anyone else anywhere, which in any way mention,
17 concern or relate to Gerald Armstrong.

18 40. All documents of any kind, including but not limited to
19 evaluations (evals), orders, project orders, mission orders,
20 program orders, targets, private investigator orders, intelligence
21 orders, OSA orders, GO orders, correspondence, reports, compliance
22 reports, ethics reports, daily reports, briefing reports,
23 debriefing reports, statistic reports, battle plans, private
24 investigator reports, photographs, audio or video recordings, made
25 by whatever means and given whatever designation or label,
26 computer records including E-mail, E-files, orders, messages,
27 directories, data, disks, tapes and any other computer storage or
28 retrieval designations whatsoever, from 1969 to the present to or
from any and all of your agents, operatives, employees, officers,

1 directors, ministers, members, units, offices, known or unknown,
2 stated or not, to anyone else anywhere, which in any way mention,
3 concern or relate to Gerald Armstrong.

4 41. All documents and materials of any kind removed by Vicki
5 Aznaran or anyone else, acting or not on your orders, from Gerald
6 Armstrong's, aka Gerry Armstrong, pc folders; aka preclear files
7 or folders, auditing or processing files or folders, and/or
8 confessional formularies, in anticipation or not of their
9 delivery, or not, to the Los Angeles Superior Court pursuant or
10 not to any order from any judge of that Court, or for any other
11 reason.

12 42. All documents of any kind, including but not limited to
13 evaluations (evals), orders, project orders, mission orders,
14 program orders, targets, private investigator orders, intelligence
15 orders, OSA orders, GO orders, correspondence, reports, compliance
16 reports, ethics reports, daily reports, briefing reports,
17 debriefing reports, statistic reports, battle plans, private
18 investigator reports, photographs, audio or video recordings, made
19 by whatever means and given whatever designation or label,
20 computer records including E-mail, E-files, orders, messages,
21 directories, data, disks, tapes and any other computer storage or
22 retrieval designations whatsoever, at any time from or to any and
23 all of your agents, operatives, employees, officers, directors,
24 ministers, members, units, offices, known or unknown, stated or
25 not, to anyone else anywhere, which in any way mention, concern or
26 relate in any way to Los Angeles Superior Court Judge Paul G.
27 Breckenridge, Jr.

28 43. All documents of any kind, including but not limited to
evaluations (evals), orders, project orders, mission orders,

1 program orders, targets, private investigator orders, intelligence
2 orders, OSA orders, GO orders, correspondence, reports, compliance
3 reports, ethics reports, daily reports, briefing reports,
4 debriefing reports, statistic reports, battle plans, private
5 investigator reports, photographs, audio or video recordings, made
6 by whatever means and given whatever designation or label,
7 computer records including E-mail, E-files, orders, messages,
8 directories, data, disks, tapes and any other computer storage or
9 retrieval designations whatsoever, at any time from or to any and
10 all of your agents, operatives, employees, officers, directors,
11 ministers, members, units, offices, known or unknown, stated or
12 not, to anyone else anywhere, which in any way mention, concern or
13 relate in any way to Michael J. Flynn.

14 44. All documents of any kind, including but not limited to
15 evaluations (evals), orders, project orders, mission orders,
16 program orders, targets, private investigator orders, intelligence
17 orders, OSA orders, GO orders, correspondence, reports, compliance
18 reports, ethics reports, daily reports, briefing reports,
19 debriefing reports, statistic reports, battle plans, private
20 investigator reports, photographs, audio or video recordings, made
21 by whatever means and given whatever designation or label,
22 computer records including E-mail, E-files, orders, messages,
23 directories, data, disks, tapes and any other computer storage or
24 retrieval designations whatsoever, at any time from or to any and
25 all of your agents, operatives, employees, officers, directors,
26 ministers, members, units, offices, known or unknown, stated or
27 not, to anyone else anywhere, which in any way mention, concern or
28 relate in any way to Ford Greene.

45. All documents of any kind, including but not limited to

1 evaluations (evals), orders, project orders, mission orders,
2 program orders, targets, private investigator orders, intelligence
3 orders, OSA orders, GO orders, correspondence, reports, compliance
4 reports, ethics reports, daily reports, briefing reports,
5 debriefing reports, statistic reports, battle plans, private
6 investigator reports, photographs, audio or video recordings, made
7 by whatever means and given whatever designation or label,
8 computer records including E-mail, E-files, orders, messages,
9 directories, data, disks, tapes and any other computer storage or
10 retrieval designations whatsoever, at any time from or to any and
11 all of your agents, operatives, employees, officers, directors,
12 ministers, members, units, offices, known or unknown, stated or
13 not, to anyone else anywhere, which in any way mention, concern or
14 relate in any way to Paul Morantz.

15 46. All documents of any kind, including but not limited to
16 evaluations (evals), orders, project orders, mission orders,
17 program orders, targets, private investigator orders, intelligence
18 orders, OSA orders, GO orders, correspondence, reports, compliance
19 reports, ethics reports, daily reports, briefing reports,
20 debriefing reports, statistic reports, battle plans, private
21 investigator reports, photographs, audio or video recordings, made
22 by whatever means and given whatever designation or label,
23 computer records including E-mail, E-files, orders, messages,
24 directories, data, disks, tapes and any other computer storage or
25 retrieval designations whatsoever, at any time from or to any and
26 all of your agents, operatives, employees, officers, directors,
27 ministers, members, units, offices, known or unknown, stated or
28 not, to anyone else anywhere, which in any way mention, concern or
relate in any way to John Elstead.

1 47. All documents of any kind, including but not limited to
2 evaluations (evals), orders, project orders, mission orders,
3 program orders, targets, private investigator orders, intelligence
4 orders, OSA orders, GO orders, correspondence, reports, compliance
5 reports, ethics reports, daily reports, briefing reports,
6 debriefing reports, statistic reports, battle plans, private
7 investigator reports, photographs, audio or video recordings, made
8 by whatever means and given whatever designation or label,
9 computer records including E-mail, E-files, orders, messages,
10 directories, data, disks, tapes and any other computer storage or
11 retrieval designations whatsoever, at any time from or to any and
12 all of your agents, operatives, employees, officers, directors,
13 ministers, members, units, offices, known or unknown, stated or
14 not, to anyone else anywhere, which in any way mention, concern or
15 relate in any way to Joseph A. Yanny.

16 48. All documents of any kind, including but not limited to
17 evaluations (evals), orders, project orders, mission orders,
18 program orders, targets, private investigator orders, intelligence
19 orders, OSA orders, GO orders, correspondence, reports, compliance
20 reports, ethics reports, daily reports, briefing reports,
21 debriefing reports, statistic reports, battle plans, private
22 investigator reports, photographs, audio or video recordings, made
23 by whatever means and given whatever designation or label,
24 computer records including E-mail, E-files, orders, messages,
25 directories, data, disks, tapes and any other computer storage or
26 retrieval designations whatsoever, at any time from or to any and
27 all of your agents, operatives, employees, officers, directors,
28 ministers, members, units, offices, known or unknown, stated or
not, to anyone else anywhere, which in any way mention, concern or

1 relate in any way to Toby A. Plevin.

2 49. All documents of any kind, including but not limited to
3 evaluations (evals), orders, project orders, mission orders,
4 program orders, targets, private investigator orders, intelligence
5 orders, OSA orders, GO orders, correspondence, reports, compliance
6 reports, ethics reports, daily reports, briefing reports,
7 debriefing reports, statistic reports, battle plans, private
8 investigator reports, photographs, audio or video recordings, made
9 by whatever means and given whatever designation or label,
10 computer records including E-mail, E-files, orders, messages,
11 directories, data, disks, tapes and any other computer storage or
12 retrieval designations whatsoever, at any time from or to any and
13 all of your agents, operatives, employees, officers, directors,
14 ministers, members, units, offices, known or unknown, stated or
15 not, to anyone else anywhere, which in any way mention, concern or
16 relate in any way to Michael L. Walton.

17 50. All documents of any kind, including but not limited to
18 evaluations (evals), orders, project orders, mission orders,
19 program orders, targets, private investigator orders, intelligence
20 orders, OSA orders, GO orders, correspondence, reports, compliance
21 reports, ethics reports, daily reports, briefing reports,
22 debriefing reports, statistic reports, battle plans, private
23 investigator reports, photographs, audio or video recordings, made
24 by whatever means and given whatever designation or label,
25 computer records including E-mail, E-files, orders, messages,
26 directories, data, disks, tapes and any other computer storage or
27 retrieval designations whatsoever, at any time from or to any and
28 all of your agents, operatives, employees, officers, directors,
ministers, members, units, offices, known or unknown, stated or

1 not, to anyone else anywhere, which in any way mention, concern or
2 relate in any way to Charles B. O'Reilly.

3 51. All documents reflecting, evidencing or relating to any
4 and all financial expenditures by you of any kind or nature,
5 including, but not limited to, wages, fees, charges, costs,
6 payments, deposits, advances, transfers or donations, for, or
7 relating in any way to, actions or things of any kind or nature,
8 including, but not limited to work, services, products,
9 operations, communications, evaluations, executions, missions,
10 projects, transportation, publications, writings, transmissions,
11 disseminations, which mention, concern or relate in any way to
12 Judge Paul G. Breckenridge, Jr., Michael J. Flynn, Bruce Bunch,
13 Michael Tabb, Julia Dragojevic, Ford Greene, Paul Morantz, John
14 Elstead, Toby Plevin, Joseph A. Yanny, Michael L. Walton and
15 Charles B. O'Reilly, made at any time to anyone or any entity,
16 including, but not limited to attorneys, law firms, brokers,
17 contractors, developers, private investigators, private
18 investigator firms, agents, agencies, operatives, case officers,
19 cutouts, your employees, your directors, and businesses or other
20 entities including printers, mail services, suppliers,
21 communications companies, and airline companies.

22 52. All organization publications, including but not limited
23 to Hubbard Communication Office Bulletins ("HCOB's"), Hubbard
24 Communication Office Policy Letters ("HCOPL's," or "PL's"),
25 Executive Directives ("ED's"), Conditions Orders, Orders, Project
26 Orders, Mission Orders, Program Orders, GO Orders and Directives,
27 OSA Orders and Directives, CMO Orders and Directives, RTC Orders
28 and Directives, CST Orders and Directives, "Freedom," "Membership
News" and all other magazines, periodicals, handouts, "DA

1 documents," or "DA packs," which in any way or manner whatsoever
2 contain any mention of, or concern or relate to, Judge Paul G.
3 Breckenridge, Jr., Michael J. Flynn, Bruce Bunch, Michael Tabb,
4 Julia Dragojevic, Ford Greene, Paul Morantz, John Elstead, Toby
5 Plevin, Joseph A. Yanny, Michael L. Walton and Charles B.
6 O'Reilly.

7 53. All documents of any kind, including but not limited to
8 evaluations (evals), orders, project orders, mission orders,
9 program orders, targets, private investigator orders, intelligence
10 orders, OSA orders, GO orders, correspondence, reports, compliance
11 reports, ethics reports, daily reports, briefing reports,
12 debriefing reports, statistic reports, battle plans, private
13 investigator reports, photographs, audio or video recordings, made
14 by whatever means and given whatever designation or label,
15 computer records including E-mail, E-files, orders, messages,
16 directories, data, disks, tapes and any other computer storage or
17 retrieval designations whatsoever, at any time from or to any and
18 all of your agents, operatives, employees, officers, directors,
19 ministers, members, units, offices, known or unknown, stated or
20 not, to anyone else anywhere, which in any way mention, concern or
21 relate in any way to Bent Corydon, Omar V. Garrison, Laurel
22 Sullivan, William Franks, Howard Schomer, Michael Douglas, Malcolm
23 Nothling, Gary M. Bright, Jerold Fagelbaum, David Mayo, John
24 Nelson, Harvey Haber, Vivien Zegel, Dede Reisdorf, Robin Scott,
25 Vicki Aznaran, Richard Aznaran, Jonathan Atack, Lawrence
26 Wollersheim, Bob Penny, Dennnis Erlich, Arnie Lerma, Margery
27 Wakefield, Enid Vien, Gabriel Cazares, Nancy McLean, John McLean,
28 Ronald Lawley, Steven Fishman, Uwe Geertz, Ph.D., Margaret Singer,
Ph.D., Garry Scarff, Cynthia Kisser, Priscilla Coates, John Clark,

1 M.D., Edward Lottick, M.D., Robert Vaughn Young, Stacy Young, Hana
2 Whitfield, Jerry Whitfield.

3 54. All documents reflecting, evidencing or relating to any
4 and all financial expenditures by you of any kind or nature,
5 including, but not limited to, wages, fees, charges, costs,
6 payments, deposits, advances, transfers or donations, for, or
7 relating in any way to, actions or things of any kind or nature,
8 including, but not limited to work, services, products,
9 operations, communications, evaluations, executions, missions,
10 projects, transportation, publications, writings, transmissions,
11 disseminations, which mention, concern or relate in any way to
12 Bent Corydon, Omar V. Garrison, Laurel Sullivan, William Franks,
13 Howard Schomer, Michael Douglas, Malcolm Nothling, Gary M. Bright,
14 Jerold Fagelbaum, David Mayo, John Nelson, Harvey Haber, Vivien
15 Zegel, Dede Reisdorf, Robin Scott, Vicki Aznaran, Richard Aznaran,
16 Jonathan Attack, Lawrence Wollersheim, Bob Penny, Dennnis Erlich,
17 Arnie Lerma, Margery Wakefield, Enid Vien, Gabriel Cazares, Nancy
18 McLean, John McLean, Ronald Lawley, Steven Fishman, Uwe Geertz,
19 Ph.D., Margaret Singer, Ph.D., Garry Scarff, Cynthia Kisser,
20 Priscilla Coates, John Clark, M.D., Edward Lottick, M.D., Robert
21 Vaughn Young, Stacy Young, Hana Whitfield, Jerry Whitfield, made
22 at any time to anyone or any entity, including, but not limited to
23 attorneys, law firms, brokers, contractors, developers, private
24 investigators, private investigator firms, agents, agencies,
25 operatives, case officers, cutouts, your employees, your
26 directors, and businesses or other entities including printers,
27 mail services, suppliers, communications companies, and airline
28 companies.

55. All organization publications, including but not limited

1 to Hubbard Communication Office Bulletins ("HCOB's"), Hubbard
2 Communication Office Policy Letters ("HCOPL's," or "PL's"),
3 Executive Directives ("ED's"), Conditions Orders, Orders, Project
4 Orders, Mission Orders, Program Orders, GO Orders and Directives,
5 OSA Orders and Directives, CMO Orders and Directives, RTC Orders
6 and Directives, CST Orders and Directives, "Freedom," "Membership
7 News" and all other magazines, periodicals, handouts, "DA
8 documents," or "DA packs," which in any way or manner whatsoever
9 contain any mention of, or concern or relate to Bent Corydon, Omar
10 V. Garrison, Laurel Sullivan, William Franks, Howard Schomer,
11 Michael Douglas, Malcolm Nothling, Gary M. Bright, Jerold
12 Fagelbaum, David Mayo, John Nelson, Harvey Haber, Vivien Zegel,
13 Dede Reisdorf, Robin Scott, Vicki Aznaran, Richard Aznaran,
14 Jonathan Atack, Lawrence Wollersheim, Bob Penny, Dennnis Erlich,
15 Arnie Lerma, Margery Wakefield, Enid Vien, Gabriel Cazares, Nancy
16 McLean, John McLean, Ronald Lawley, Steven Fishman, Uwe Geertz,
17 Ph.D., Margaret Singer, Ph.D., Garry Scarff, Cynthia Kisser,
18 Priscilla Coates, John Clark, M.D., Edward Lottick, M.D., Robert
19 Vaughn Young, Stacy Young, Hana Whitfield, Jerry Whitfield.

20 56. Any and all Flag Conditions Orders (FCO's) or any other
21 Conditions Orders or Ethics Orders of any kind which mention,
22 refer or relate in any way to "Suppressive Persons," aka "SP's,"
23 or anyone labelled "suppressive, a "suppressive person," or "SP."

24 57. All documents of any kind, including but not limited to
25 evaluations (evals), orders, project orders, mission orders,
26 program orders, targets, private investigator orders, intelligence
27 orders, OSA orders, GO orders, correspondence, reports, compliance
28 reports, ethics reports, daily reports, briefing reports,
debriefing reports, statistic reports, battle plans, private

1 investigator reports, photographs, audio or video recordings, made
2 by whatever means and given whatever designation or label,
3 computer records including E-mail, E-files, orders, messages,
4 directories, data, disks, tapes and any other computer storage or
5 retrieval designations whatsoever, at any time from or to any and
6 all of your agents, operatives, employees, officers, directors,
7 ministers, members, units, offices, known or unknown, stated or
8 not, to anyone else anywhere, which in any way mention, concern or
9 relate in any way to FACTNet, aka FACT, or "Fight Against Coercive
10 Therapies."

11 58. All documents of any kind, including but not limited to
12 evaluations (evals), orders, project orders, mission orders,
13 program orders, targets, private investigator orders, intelligence
14 orders, OSA orders, GO orders, correspondence, reports, compliance
15 reports, ethics reports, daily reports, briefing reports,
16 debriefing reports, statistic reports, battle plans, private
17 investigator reports, photographs, audio or video recordings, made
18 by whatever means and given whatever designation or label,
19 computer records including E-mail, E-files, orders, messages,
20 directories, data, disks, tapes and any other computer storage or
21 retrieval designations whatsoever, at any time from or to any and
22 all of your agents, operatives, employees, officers, directors,
23 ministers, members, units, offices, known or unknown, stated or
24 not, to anyone else anywhere, which in any way mention, concern or
25 relate in any way to CAN, aka "Cult Awareness Network."

26 59. All documents of any kind, including but not limited to
27 evaluations (evals), orders, project orders, mission orders,
28 program orders, targets, private investigator orders, intelligence
orders, OSA orders, GO orders, correspondence, reports, compliance

1 reports, ethics reports, daily reports, briefing reports,
2 debriefing reports, statistic reports, battle plans, private
3 investigator reports, photographs, audio or video recordings, made
4 by whatever means and given whatever designation or label,
5 computer records including E-mail, E-files, orders, messages,
6 directories, data, disks, tapes and any other computer storage or
7 retrieval designations whatsoever, at any time from or to any and
8 all of your agents, operatives, employees, officers, directors,
9 ministers, members, units, offices, known or unknown, stated or
10 not, to anyone else anywhere, which in any way mention, concern or
11 relate in any way to AFF, aka "American Family Foundation."

12 60. Any and all HCOB's, PL's, Directives, Orders, Conditions
13 Orders, Program Orders, Project Orders, Missions Orders, GO
14 Orders, OSA Orders or Directives, WDC Orders or Directives, RTC
15 Orders or Directives, or any other issue type, whether canceled or
16 revised at any time, which mention, refer to or relate in any way
17 to SP's and/or the treatment or handling of SP's, as that term is
18 used and understood in your writings and jargon.

19 61. Any and all HCOB's, PL's, Directives, Orders, Conditions
20 Orders, Program Orders, Project Orders, Missions Orders, GO
21 Orders, OSA Orders or Directives, WDC Orders or Directives, RTC
22 Orders or Directives, or any other issue type, whether canceled or
23 revised at any time, which mention, refer to or relate in any way
24 to "squirrels" as that term is commonly understood in your
25 writings and jargon.

26 62. Any and all HCOB's, PL's, Directives, Orders, Conditions
27 Orders, Program Orders, Project Orders, Missions Orders, GO
28 Orders, OSA Orders or Directives, WDC Orders or Directives, RTC
Orders or Directives, or any other issue type, whether canceled or

1 revised at any time, which mention, refer to or relate in any way
2 to the non-Scientology justice system of the United States or any
3 other nation (aka "wog justice").

4 63. Any and all HCOB's, PL's, Directives, Orders, Conditions
5 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
6 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
7 Directives, or any other issue type, whether canceled or revised
8 at any time, which mention, refer to or relate in any way to
9 espionage, intelligence, intelligence operations, covert
10 operations, under cover operations, intelligence agents or
11 operatives, case officers or black propaganda, black PR or black
12 PR campaigns.

13 64. Any and all HCOB's, PL's, Directives, Orders, Conditions
14 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
15 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
16 Directives, or any other issue type, whether canceled or revised
17 at any time which mention, refer to or relate in any way to real
18 or imagined, named or not named, "enemies," opponents, opposition
19 of yours.

20 65. Any and all HCOB's, PL's, Directives, Orders, Conditions
21 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
22 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
23 Directives, or any other issue type, whether canceled or revised
24 at any time which mention, refer to or relate in any way to judges
25 of local, state and federal courts in the United States or any
26 other nation (aka "wog" judges), whether named or not and/or
27 intelligence or public relations "handlings" of any such judges,
28 whether named or not.

66. All documents of any kind, including but not limited to

1 evaluations (evals), orders, project orders, mission orders,
2 program orders, targets, private investigator orders, intelligence
3 orders, OSA orders, GO orders, correspondence, reports, compliance
4 reports, ethics reports, daily reports, briefing reports,
5 debriefing reports, statistic reports, battle plans, private
6 investigator reports, photographs, audio or video recordings, made
7 by whatever means and given whatever designation or label,
8 computer records including E-mail, E-files, orders, messages,
9 directories, data, disks, tapes and any other computer storage or
10 retrieval designations whatsoever, at any time from or to any and
11 all of your agents, operatives, employees, officers, directors,
12 ministers, members, units, offices, known or unknown, stated or
13 not, to anyone else anywhere, which in any way mention, concern or
14 relate in any way to any judge who presided on any case of any
15 kind in which you were a party, including, but not limited to US
16 District Judges Ideman, Ritchey and Krentzman.

17 67. Any and all HCOB's, PL's, Directives, Orders, Conditions
18 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
19 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
20 Directives, or any other issue type, whether canceled or revised
21 at any time which mention, refer to or relate in any way to
22 litigation, litigating and using the courts and law, or "wog
23 courts" or "wog justice" system to harass.

24 68. Any and all HCOB's, PL's, Directives, Orders, Conditions
25 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
26 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
27 Directives, or any other issue type, whether canceled or revised
28 at any time which mention, refer to or relate in any way to
private investigators, their hiring, their operating or running,

1 and their use against perceived enemies or opponents by
2 Scientology.

3 69. Any and all HCOB's, PL's, Directives, Orders, Conditions
4 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
5 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
6 Directives, or any other issue type, whether canceled or revised
7 at any time which mention, refer to or relate in any way to
8 penalties or ethics penalties, or punishment or ethics punishment,
9 "conditions" or ethics conditions.

10 70. Any and all documents establishing, governing,
11 concerning, mentioning or relating in any way to the
12 Rehabilitation Project Force ("RPF"), from 1974 to the present,
13 including, but not limited to security checks, aka "sec checks,"
14 Flag Orders, Flag Conditions Orders, the FO 3434 series.

15 71. Any and all HCOB's, PL's, Directives, Orders, Conditions
16 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
17 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
18 Directives, or any other issue type, whether canceled or revised
19 at any time which mention, refer to or relate in any way to mental
20 health, mental healing, knowledge of mental health and healing,
21 and/or the taking over, intended taking over or domination of the
22 field of mental health by you.

23 72. Any and all HCOB's, PL's, Directives, Orders, Conditions
24 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
25 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
26 Directives, or any other issue type, whether canceled or revised
27 at any time which mention, refer to or relate in any way to
28 rockslams (aka R/Ses), their meaning, and the consequences of such
occurrences to staff members undergoing auditing.

1 73. All documents of any kind on which you based your
2 publication " Squirrels" which listed Armstrong as one of six such
3 "squirrels."

4 74. All documents of any kind on which the you based any and
5 all of your claims concerning Armstrong in the case of RTC v.
6 Yanny (commonly known as Yanny II).

7 75. All documents of any kind on which you based any and all
8 of your claims concerning Armstrong contained in the affidavits of
9 Kenneth Long and Sheila Chaleff or any other documents filed in
10 the case of Church of Scientology of California v. Russell Miller
11 & Penguin Books in London, England.

12 76. All correspondence, orders or documents of any kind
13 which mention, concern or relate in any way to Gerald Armstrong
14 which were given or delivered at any time and in any way or manner
15 to any private investigator, intelligence agent or any other agent
16 or person employed or not by you.

17 77. All correspondence, reports or documents of any kind
18 which mention, concern or relate in any way to Gerald Armstrong
19 which were received at any time by you, or agents, operatives or
20 attorneys of yours, from any private investigator, intelligence
21 agent or any other agent or person employed or not by you.

22 78. Any and all photographs of Gerald Armstrong.

23 79. Any and all videotapes and/or audiotapes, in their
24 entirety and all edited or altered versions thereof, which
25 mention, contain the likeness of, or relate in any way to Gerald
26 Armstrong.

27 80. All documents on which you based the statements in the
28 document described as the "Bent Corydon dead agent pack," which
concern or relate in any way to Gerald Armstrong.

1 81. All documents which state, show or reflect the
2 relationship of David Miscavige to each component of Scientology
3 listed in definitions no. 5, above.

4 82. All documents of any kind, including but not limited to
5 evaluations (evals), orders, project orders, mission orders,
6 program orders, targets, private investigator orders, intelligence
7 orders, OSA orders, GO orders, correspondence, reports, compliance
8 reports, ethics reports, daily reports, briefing reports,
9 debriefing reports, statistic reports, battle plans, private
10 investigator reports, photographs, audio or video recordings, made
11 by whatever means and given whatever designation or label,
12 computer records including E-mail, E-files, orders, messages,
13 directories, data, disks, tapes and any other computer storage or
14 retrieval designations whatsoever, at any time to any and all of
15 your agents, operatives, employees, officers, directors,
16 ministers, members, units, offices, known or unknown, stated or
17 not, or anyone else anywhere, from David Miscavige which mention,
18 concern or relate in any way to Gerald Armstrong.

19 83. All documents of any kind, including but not limited to
20 evaluations (evals), orders, project orders, mission orders,
21 program orders, targets, private investigator orders, intelligence
22 orders, OSA orders, GO orders, correspondence, reports, compliance
23 reports, ethics reports, daily reports, briefing reports,
24 debriefing reports, statistic reports, battle plans, private
25 investigator reports, photographs, audio or video recordings, made
26 by whatever means and given whatever designation or label,
27 computer records including E-mail, E-files, orders, messages,
28 directories, data, disks, tapes and any other computer storage or
retrieval designations whatsoever, at any time from any and all of

1 your agents, operatives, employees, officers, directors,
2 ministers, members, units, offices, known or unknown, stated or
3 not, or anyone else anywhere, to David Miscavige which mention,
4 concern or relate in any way to Gerald Armstrong.

5 84. All documents of any kind on which David Miscavige based
6 each and every one of his allegations concerning Armstrong in
7 Miscavige's declaration executed February 8, 1994 for filing in
8 the case of Scientology v. Geertz, USDC for the Central District
9 of California, No. CV 91-6426 HLH(Tx).

10 85. All documents on which your agent Eugene M. Ingram based
11 his statement that Gerald Armstrong has AIDS.

12 86. All documents on which you base your assertion that
13 Gerald Armstrong is an SP.

14 87. All documents, including but not limited to the
15 handwritten documents by L. Ron Hubbard commonly known as the
16 "affirmations, or "admissions," which contain Hubbard's statements
17 that all men are his slaves and that he had the right to use men's
18 minds as he wished and to be merciless.

19 88. All documents on which you base the assertion that you
20 can brain wash faster than the Russians and can produce total
21 amnesia in twenty seconds.

22 89. All documents on which you base your assertion that L.
23 Ron Hubbard was not a pathological liar.

24 90. All documents on which you base your assertion in the
25 November 1989 declaration of Lawrence Heller that "one of the key
26 ingredients to completing these (December 1986) settlements,
27 insisted upon by all parties involved, was strict confidentiality
28 respecting: (1) the Scientology parishioner or staff member's
experiences within the Church of Scientology; (2) any knowledge

1 possessed by the Scientology entities concerning those staff
2 members or parishioners; and (3) the terms and conditions of the
3 settlements themselves."

4 91. All documents on which you base your allegations
5 concerning Armstrong in your complaint filed in 1991 in the case
6 of Scientology v. Xanthos, US District Court, Central District of
7 California, Case No. 91-4301-SVW (Tx).

8 92. All documents on which you bases your assertion that
9 your agents, staff or members do not cull preclear folders, do not
10 provide the supposedly confidential statements of individuals
11 undergoing auditing to organization executives, personnel in their
12 legal or intelligence branches and hired private investigators,
13 and do not use such supposedly confidential statements against
14 said individuals who have undergone auditing for any purpose
15 whatsoever and/or in any circumstances whatsoever.

16 93. Any and all documents which comprise, show, evidence,
17 reflect, concern or relate in any way to your claim that auditing
18 raises the intelligence quotient of people undergoing it; i.e.,
19 "preclears," or "auditees," one point per hours of auditing.

20 94. Any and all documents which comprise, show, evidence,
21 reflect, concern or relate in any way to any and all research or
22 tests done at any time which gave rise to or supports your claim
23 that auditing raises the intelligence quotient of people
24 undergoing it; i.e., "preclears," or "auditees," one point per
25 hours of auditing.

26 95. All declarations or affidavits filed by you in any
27 lawsuit, administrative proceeding, arbitration, mediation,
28 criminal proceeding, in any court or jurisdiction anywhere, which
mention, concern or relate in any way to Gerald Armstrong.

1 96. Any documents of any kind whatsoever which support,
2 evidence or reflect any and all damages, whether real or imagined,
3 suffered by you, as a result of each and every act by Gerald
4 Armstrong which you allege is a breach of the 1986 "settle
5 agreement."

6 97. Any and all judicial judgments, rulings, decisions or
7 opinions in any court or jurisdiction anywhere, which mention,
8 concern or relate in any way to "fair game" or "fair game policy"
9 or "fair game doctrine."

10 98. Any and all documents which support your contention that
11 you are permitted by the 1986 "settlement agreement" with
12 Armstrong to say or publish whatever you want concerning his
13 experiences in relation to you and/or L. Ron Hubbard, and that any
14 response by Armstrong to such statements or publications
15 concerning his experiences constitutes a violation of the 1986
16 "settlement agreement."

17 99. All documents which support your assertions that the GO
18 was "criminal," "went criminal" or "were a bunch of criminals."

19 100. All documents comprising, evidencing or reflecting each
20 and every communication from L. Ron Hubbard to anyone in the GO at
21 any time.

22 101. All documents comprising, evidencing or reflecting each
23 and every communication from anyone in the GO, including Guardian
24 and Controller Mary Sue Hubbard, to L. Ron Hubbard at any time.

25 102. Any and all documents of any kind whatsoever which
26 order, suggest, describe, refer to, or relate in any way to
27 illegal or criminal acts by agents, staff or members of the GO, or
28 of any other of your branches, offices or units past or present.

103. Any and all documents of any kind whatsoever which

1 concern, show or relate in any way to David Miscavige's and/or
2 your takeover of the GO, and/or removal of Mary Sue Hubbard from
3 her post of Controller.

4 104. Any and all documents upon which you base your
5 pronouncement that Armstrong posed nude in a newspaper.

6 105. Any and all documents upon which you base your
7 pronouncement that Armstrong has adopted a degraded lifestyle.

8 106. Any and all documents upon which you base your
9 pronouncement that Armstrong's defense at his trial in 1984 in
10 Armstrong I was a sham and a fraud.

11 107. Any and all documents upon which you base your
12 pronouncement that the Los Angeles Police Department authorized
13 your covert videotaping of Armstrong.

14 108. Any and all documents upon which you base your
15 pronouncement that Armstrong never intended to stick to the terms
16 of the settlement agreement.

17 109. Any and all documents upon which you base your
18 pronouncement that Armstrong was incompetent as a researcher.

19 110. Any and all documents upon which you base your
20 pronouncement that Armstrong perjured himself about surrendering
21 documents to the court.

22 111. Any and all documents upon which you base your
23 pronouncement that Armstrong was ever a heavy drug pusher.

24 112. Any and all documents upon which you base your
25 pronouncement that Armstrong is psychotic and lives in a delusory
26 world.

27 113. Any and all documents upon which you base your
28 pronouncement that incarceration is an unusually viable vehicle
for impressing Armstrong.

1 114. Any and all documents upon which you base your
2 pronouncement that Armstrong wanted to plunder you for his own
3 financial gain.

4 115. Any and all documents upon which you base your
5 pronouncement that Armstrong's motives are money and power.

6 116. Any and all documents upon which you base your
7 pronouncement that Armstrong has no relation to art or
8 artists...except of course, for the photo of himself nude, hugging
9 the globe.

10 117. Any and all documents upon which you base your
11 pronouncement that Armstrong promised to refrain from spreading
12 falsehoods about you.

13 118. Any and all documents upon which you base your
14 pronouncement that Armstrong's motives in writing your attorney
15 Eric Lieberman regarding the case of Malcolm Nothing v.
16 Scientology were money and power.

17 119. Any and all documents upon which you base your
18 pronouncement that Armstrong wanted to plant fabricated documents
19 in Scientology files and tell the IRS to conduct a raid.

20 120. Any and all documents upon which you base your
21 pronouncement that Armstrong is connected to a referral agency for
22 kidnapping.

23 121. Any and all documents upon which you base your
24 contention that God does not exist, is not real, and/or that He is
25 an implant, as the term "implant" is used and understood in your
26 writings and jargon.

27 122. Any and all documents upon which you base your
28 contention that Jesus Christ does not exist, is not real, and/or
that He is an implant, as implant is used and understood in your

1 writings and jargon.

2 123. Any and all documents upon which you base your
3 contention that the Holy Spirit does not exist, is not real,
4 and/or that He is an implant, as implant is used and understood in
5 your writings and jargon.

6 124. Any and all documents upon which you base your
7 contention that Heaven does not exist, is not real, and/or that it
8 is an implant, as implant is used and understood in your writings
9 and jargon.

10 125. Any and all documents comprising, evidencing, concerning
11 or relating in any way to your ordering, briefing, advising or in
12 any way communicating to any "celebrities," including, but not
13 limited to John Travolta, Kirstie Alley, Ann Archer and Tom
14 Cruise, what or concerning what statements, in public or private,
15 any or all of them should, are or ever were to make concerning
16 you, and/or Gerald Armstrong, and/or L. Ron Hubbard, and/or
17 auditing or any other matter relating to you or Gerald Armstrong.

18 126. Any and all biographies of L. Ron Hubbard, including but
19 not limited to "about the author" sections and/or biographical
20 sketches or any other writing published, written and/or
21 disseminated in any form at any time by you from 1950 to the
22 present.

23 127. Each and every document on which you base each and every
24 assertion about L. Ron Hubbard made in each of the biographies of
25 L. Ron Hubbard, including but not limited to "about the author"
26 sections and/or biographical sketches or any other writing
27 published, written and/or disseminated in any form at any time by
28 you from 1950 to the present.

128. Each and every document which mentions, concerns or

1 relates in any way to John W. Parsons, Flavia Julia, the
2 "Empress," Margery Cameron and/or Aleister Crowley.

3 129. Each and every document which supports your asserting
4 that L. Ron Hubbard was sent by the United States Navy into a
5 black magic ring to break it up.

6 130. Each and every document on which you base each and every
7 allegation concerning Gerald Armstrong in this case, Scientology
8 v. Armstrong, US Bankruptcy Court for the Northern District of
9 California, Case no. 95-1164, hereinafter "Armstrong V."

10 131. Each and every document identifying, listing, showing,
11 evidencing, reflecting, concerning or relating in any way to each
12 and every organization aligned against you, as referred to in
13 Exhibit A, to the complaint in Armstrong V., at para. 7G .

14 132. Each and every document recording, evidencing,
15 reflecting, concerning or relating in any way to any discussions,
16 communications or negotiations of any kind, form or nature between
17 you and/or Michael Flynn and/or Gerald Armstrong concerning
18 liquidated damages as a condition of settlement, the amount of
19 such liquidated damages condition, the reasonable of such
20 liquidated damages condition, and any relationship of any kind
21 between such liquidated damages and any actual or actually
22 foreseeable damages.

23 133. Each and every document showing, evidencing, reflecting,
24 concerning or relating in any way to your assets in December,
25 1986, including, but not limited to, cash, income, bank accounts,
26 holdings, real property, intellectual property, personnel, rights,
27 patents, stocks, commodities, and contracts, located anywhere in
28 the world.

134. Each and every "confidentiality agreement," "non-

1 disclosure agreement," "confidentiality bond," or "non-disclosure
2 bond," to which you are or have ever been a party or beneficiary
3 from 1950 to the present.

4 135. Any and all documents identifying, listing, naming,
5 showing or indicating each and every individual who executed each
6 and every "confidentiality agreement," "non-disclosure agreement,"
7 "confidentiality bond," or "non-disclosure bond," to which you are
8 or have ever been a party or beneficiary from 1950 to the present.

9 136. Any and all documents comprising, evidencing or
10 reflecting, concerning or relating in any way to any attempt or
11 effort by you to enforce by any means or manner whatsoever any or
12 every "confidentiality agreement," "non-disclosure agreement,"
13 "confidentiality bond," or "non-disclosure bond," to which you are
14 or have ever been a party or beneficiary from 1950 to the present.

15 137. Each and every lawsuit, complaint, prosecution or
16 administrative proceeding from 1950 to the present in which you
17 are or have been a named party.

18 138. Each and every lawsuit, complaint, prosecution or
19 administrative proceeding from 1950 to the present participated
20 in, or funded or supported in any way or manner whatsoever in
21 which you were not a named party.

22 139. Each and every appellate opinion or decision published
23 or unpublished in any appeal of any judgment decision or ruling in
24 any case in which you are or were a party at any time anywhere in
25 the world.

26 140. Each and every request or demand for refund or repayment
27 of money paid to you by any and all persons at any time from 1950
28 to the present.

141. Each and every document produced by Gerald Armstrong to

1 you in the case of Scientology v. Armstrong, Marin County Superior
2 Court No. 157680 ("Armstrong IV").

3 142. Each and every document on which you base your assertion
4 that Gerald Armstrong's experiences as a Scientologist were not
5 religious experiences.

6 143. Each and every document which show or evidence that your
7 actions of any kind in using the secular courts or any extra-legal
8 means to silence Armstrong or prevent him from expressing his
9 opinions about you, L. Ron Hubbard or any other subject, or
10 prevent him from responding to anything stated by you about him,
11 or any attack on him, are not violations of your "creed;"
12 specifically that all men have inalienable rights to talk freely,
13 to write freely their own opinions and to counter or utter or
14 write upon the opinions of others; that all men have inalienable
15 rights to their own religious practices and their performance;
16 that all men have inalienable rights to their own defense; and
17 that no agency less than God has the power to suspend or set aside
18 these rights, overtly or covertly.

19 144. Each and every document on which you base your assertion
20 that in any or every action taken by Gerald Armstrong which relate
21 in any way to you he was not guided by God.

22
23
24
25
A handwritten signature in black ink, appearing to be 'G. Armstrong', with a large, dark, circular stamp or mark over it.

26 DATED: August 16, 1995

GERALD ARMSTRONG

PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 715 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents:

ARMSTRONG'S FIRST INSPECTION DEMAND TO PLAINTIFF

on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Andrew Wilson, Esquire
WILSON, RYAN & CAMPILONGO
115 Sansome Street, 4th Floor
San Francisco, California 94104

PERSONAL SERVICE

LAURIE J. BARTILSON, ESQ.
Moxon & Bartilson
6255 Sunset Boulevard, Suite 2000
Los Angeles, California 90028

MAIL

[x] (By Mail)	I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.
[x] (Personal)	I caused said papers to be personally served on the office of counsel.
[x] (State)	I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: August 16, 1995

EXHIBIT B

MOXON & BARTILSON
ATTORNEYS AT LAW
6255 SUNSET BOULEVARD
SUITE 2000
HOLLYWOOD, CALIFORNIA 90028
TELEPHONE (213) 960-1936
TELECOPIER (213) 953-3351

KENDRICK L. MOXON

LAURIE J. BARTILSON

ALSO ADMITTED IN
THE DISTRICT OF COLUMBIA

ALSO ADMITTED IN
MASSACHUSETTS

September 15, 1995

BY TELEFAX AND U.S. MAIL

Gerald Armstrong
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

Re: In re Gerald Armstrong
BK No. 95-10911 aj; Adv. No. 95-1164

Dear Mr. Armstrong:

I am in receipt of "Gerald Armstrong's First Inspection Demand To Plaintiff."

I direct your attention to Federal Rules of Civil Procedure, Rule 26(d) which provides, in relevant part, that "[e]xcept when authorized under these rules or by local rule, order or agreement of the parties, a party may not seek discovery from any source before the parties have met and conferred as required by subdivision (f)."

No rule, local rule, order or agreement relieves you from complying with this rule in this action.

Accordingly, I request that you withdraw your inspection demand, as it is not authorized by the Federal Rules, and that we meet and confer to establish a discovery plan, as is required by Rule 26(f). I have the following dates available for such a meeting: October 23, 24, 25 or 30.

Kindly advise me no later than 12:00 noon on Monday, September 18, 1995, whether you intend to withdraw your discovery request and proceed in accordance with the Federal Rules. In the event that you do not withdraw the request, I will file a motion for protective order and seek sanctions for wilful abuse of the discovery process.

I look forward to hearing from you.

Sincerely,

MOXON & BARTILSON


Laurie J. Bartilson

LJB:aeu

cc: Andrew H. Wilson, Esq.
Jeffrey G. Locke

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of California, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Hollywood, CA 90028.

On September 19, 1995, I served the foregoing document described as DECLARATION OF LAURIE J. BARTILSON IN SUPPORT OF CHURCH OF SCIENTOLOGY INTERNATIONAL'S MOTION FOR PROTECTIVE ORDER, AND REQUEST FOR SANCTIONS on interested parties in this action,

[] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [] the original [X] true copies thereof in sealed envelopes addressed as follows:

Gerald Armstrong
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

Linda Sorensen
Feldman, Waldman & Kline
2700 Russ Bldg.
235 Montgomery St.
San Francisco, CA 94104-3160

[X] BY MAIL

[] *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[X] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more

than one day after date of deposit for mailing an affidavit.

Executed on September 19, 1995, at Los Angeles, California.

[] **(BY PERSONAL SERVICE) I delivered such envelopes by hand to the offices of the addressees.

Executed on _____, at Los Angeles, California.

[X] (State) I declare under penalty of the laws of the State of California that the above is true and correct.

[] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Alfred E. Lemura
Print or Type Name

Mr. J. E. Lemura
Signature

* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

** (For personal service signature must be that of messenger)